

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS (SPRINGFIELD)

ACCESS 4 ALL, INC.,
a Florida not-for-profit corporation,
and FELIX ESPOSITO, individually,

Plaintiff,

CIVIL ACTION NO.: 1:04-cv-12347 (MAP)

v.

DELANCEY CLINTON ASSOCIATES, L.P.,
a Pennsylvania Limited Partnership,

Defendant.

_____ /

PLAINTIFF'S LOCAL RULE 16.1 (d) CERTIFICATE

Pursuant to Local Rule 16.1(d)(3), the undersigned counsel and parties hereby
certify that they have conferred:

- (a) With a view to establishing a budget for the costs of conducting the full
course -- and various alternative courses -- of the litigation; and
- (b) To consider the resolution of the litigation through the use of alternative
dispute resolution programs such as those outlined in L.R. 16.4.

Respectfully submitted,


Peter Di Palma

 MP tLD 6/29/05
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